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8EHG-10-18128	88110000012	10/13/10

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The Chemical Company

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October 12, 2010



Via Federal Express

United States Environmental Protection Agency - East
Attn: TSCA Section 8(e)
Room 6428
1201 Constitution Avenue, NW
Washington, DC 20004

Subject: Notice in Accordance with Section 8(e): Results of an Acute Toxicity Study in Water Flea (*Daphnia magna*) with a Mixture Containing Two Active Ingredients; **(1)** 2-Pyrimidinamine, 4,6-dimethyl-N-phenyl (CAS No. 53112-28-0) and **(2)** Naphtho[2,3-b]-1,4-dithiin-2,3-dicarbonitrile, 5,10-dihydro-5,10- dioxo- (CAS No. 3347-22-6)

Dear Sir/Madam:

BASF Corporation is submitting results of an Acute Toxicity Study in Water Flea (*Daphnia magna*) with a mixture containing two active ingredients; **(1)** 2-Pyrimidinamine, 4,6-dimethyl-N-phenyl (CAS No. 53112-28-0) and **(2)** Naphtho[2,3-b]-1,4-dithiin-2,3-dicarbonitrile, 5,10-dihydro-5,10- dioxo- (CAS No. 3347-22-6) conducted by BASF SE, Ludwigshafen, Germany. The substance is a formulation.

Content of the formulation:

A.I. (1)	250 g/L nominal
A.I. (2)	250 g/L nominal

The test was conducted in a static system over 48 hours according to the following test guidelines: Acute Toxicity to *Daphnia*, OECD Guideline for Testing of Chemicals, No. 202 (April 2004); *Daphnia* sp., Acute Immobilization Test.

The following initial mean measured concentrations were tested: 0, 0.14, 0.21, 0.32, 0.48 and 0.72 mg/L.

All test solutions were visibly clear over the entire exposure period.

Analysis of the test item concentration were performed.



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Analytical verification of the two active ingredients was carried out in each test concentration at the beginning and at the end of the test. Measured values for A.I. (1) at test initiation were 97.4 – 100% (average of 98.9%) and 95.4% of nominal at the termination. Measured values for A.I. (2) at test initiation were 89.8 – 93.1% (average 91.5%) and at the end of the test the determination of the substance showed complete degradation of this active ingredient. The following biological results are based on nominal test item concentrations since the initial test concentrations and thus correct test item application were confirmed by the analytical measurements.

EC50 (48 h) = 0.49 mg/L

NOEC (48h) = 0.32 mg/L

LOEC (48 h) = 0.48 mg/L

BASF Corporation understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please call Janet Cerra at (973) 245-6693.

Sincerely,

Janet Cerra

Janet Cerra
Product Regulatory Center of Expertise
North America

/jc

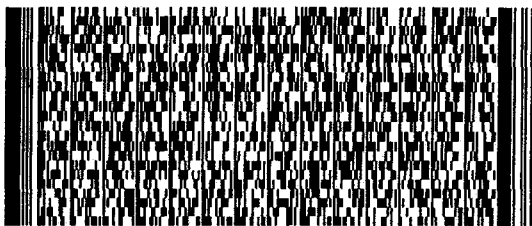
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From: Origin ID: LKKA (973) 245-6693
 Janet Cerra
 BASF
 100 Campus Drive
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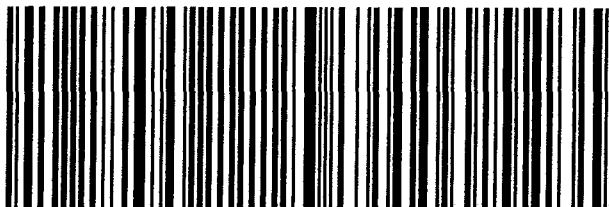
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